

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

STATE OF NEW YORK, et al.,

Plaintiffs,

v.

UNITED STATES DEPARTMENT
OF COMMERCE, et al.,

Defendants.

CIVIL ACTION NO. 1:18-cv-2921 (JMF)

SUPPLEMENTAL AFFIDAVIT OF SARA CULLINANE

Pursuant to 28 U.S.C. § 1746(2), I, Sara Cullinane, hereby declare as follows:

1. As explained in my affidavit, dated October 23, 2018, I am the co-founder and Director Of Make the Road New Jersey (“Make the Road NJ”),¹ a community-based immigrants’ rights organization with centers in Elizabeth and Passaic, New Jersey – two cities with significant foreign-born populations
2. All of the statements made in my October 23 affidavit and in this affidavit are made based on my personal knowledge acquired after fourteen years of experience working on immigrants’ rights issues. This experience includes my work as a community organizer, attorney, and now - director of Make the Road New Jersey. During this time period, I have familiarized myself with Make the Road New Jersey’s internal records, processes, and membership. It is also my practice to familiarize myself with changes in policy and practice, as well as any other related issues, that arise with regard to immigration enforcement.

¹ Make the Road NJ and Make the Road New York are two separate entities.

3. The fears of immigrant communities in New Jersey and the practical results of those fears, stated in my testimony in paragraphs 4 and 6 of my October 23 affidavit, reflect my personal knowledge. Specifically, I learned of the increased rate of arrests and detentions through my practice of familiarizing myself with changes in policy, practice, and any other issues related to immigration enforcement – which included reading newspaper articles.² My statement about lower levels of use of public services, unwillingness to interact with state and local governmental agencies, and lower enrollment at Passaic Community College as well as in the Supplemental Nutrition Association Program (“SNAP”), are based on the knowledge I acquired through outreach conducted by Make the Road New Jersey, personal interactions at Make the Road events, and through my familiarity with current events in the immigrant rights’ context.³ Through Make the Road New Jersey’s survey, we reached out to organizations in 15 of New Jersey’s 21 counties and 97% of those organizations responded that their clients have expressed fears about accessing social services since 2017.

4. In paragraph 11 of my October 23 affidavit, I described a September 2018 roundtable in which I participated. In that paragraph, I mentioned that various community groups and social services providers expressed concerns about the citizenship question. I have personal knowledge of these concerns based on my observations and conversations at that roundtable,

² https://www.nj.com/news/index.ssf/2018/02/ice_arrests_surge_under_trump_see_where_nj_ranks.html

³ <https://www.northjersey.com/story/news/2017/09/28/amid-daca-fears-passaic-county-freeholders-move-protect-undocumented-immigrants/709307001/>

as well as from reading press accounts that relate the sentiments of these organizations.⁴

I declare under penalty of perjury that, to the best of my knowledge, the foregoing is true and correct.

Executed on this 3rd day of November, 2018



Sara Cullinane
Director
Make the Road New Jersey

⁴ <https://www.njtvonline.org/news/video/state-lawmakers-push-to-maximize-participation-for-2020-census/>;
<https://www.northjersey.com/story/news/paterson-press/2018/09/19/paterson-nj-hopes-calm-immigrants-fears-2020-census-count/1356016002/>;
https://www.nj.com/news/index.ssf/2018/07/should_the_us_census_ask_immigrants_if_they_are_ci.html